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19 MR. HANES: Good afternoon. My name is Gene
20 Hanes. I'm here today to represent the Alabama
21 Public Service Commission and its president, Jim
22 Sullivan. Commissioner Sullivan has been
23 president of the Alabama PSC since 1983. He's
24 currently president of the NARUC organization that
25 you've heard described here earlier today. As a

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1 longstanding member of the NARUC committee on
2 nuclear issues and waste disposal, my remarks here
3 today reflect Mr. Sullivan's continuing interest
4 in and commitment to issues related to nuclear
5 power as a matter of importance to the Alabama
6 2... PSC. [Nuclear power from Alabama's four nuclear
7 units, those of Alabama Power and TVA, account for
8 over 20 percent of Alabama's electric generation.
9 Because of this generation, Alabama rate payers
10 have paid over \$620 million to the Nuclear Waste
11 Fund since 1983, and there are tons of spent fuel
12 stored at two sites in Alabama.

13 Although I can only speak in detail about our
14 jurisdictional utility at Alabama Power, their on-
15 site storage capacity of spent fuel to be exceeded
16 prior to its contractually required but late
17 removal by DOE, the net result will be either the
18 premature loss of generating capability with
19 additional costs for replacement power, or
20 additional costs to the utility and rate payer for
21 interim above ground storage. I don't have time
22 to repeat the comments you've heard from
23 Commissioner Clark, Bradley and McDonald, the
24 comments they've expressed here today. But the
25 Alabama Public Service Commission agrees with

1 2 cont. their assessments of the DEIS and the nuclear
2 waste program in general. Suffice it to say that
3 the Alabama PSC does not believe that any citizen
4 has been particularly well served to this point in
5 time as a result of the nearly \$16 billion
6 collected nationally from rate payers to solve
7 this problem.

8 I would like to address one specific area of
9 3... the DEIS. [The DEIS addresses many complex issues
10 in the proposed action about the development and
11 long-term performance of the repository over
12 10,000 or more years, which is appropriate. Yet
13 the greatest geographic and population impacts of
14 the proposed repository take place over a shorter
15 period of 24 years, during which time spent
16 nuclear fuel and high-level radioactive waste is
17 packaged and transported from 77 sites in 34
18 states through as many as 44 states to the
19 repository. Thus, the largest single sections of
20 the DEIS addresses environmental impacts of
21 transportation. The introduction to that section
22 of the DEIS states that, "While DOE is uncertain
at
23 what time the transportation-related decisions
24 need to be made, the DEIS provides the information

25 3 cont. | necessary to make decisions about basic approaches

3 cont.

or modes of shipment, as well as alternative transportation corridors both nationwide and within Nevada." It leaves for later analysis considerations, specific implementing decisions and appropriate environmental impact review. The Alabama Public Service Commission believes that this is a sound approach, as it presents an overview now and provides for analysis that is more thorough when more specific information on alternatives is available to stake holders and decision makers.

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Transportation impacts are examined in a generic sense for various modes for national routes in greater detail for the various corridors within Nevada. Most impacts seem to be as expected for such development and operation. Routing within the state of Nevada is something that is best considered by cooperative planning by the federal government agencies involved and state and local government officials. In recognition of potential conflict and the ultimate safety of the citizens, it does seem appropriate to suggest that the federal government take the necessary steps to enable the minimizing of transportation routing through populated areas of Nevada, as is the

1 4 cont. principle in route choices in other states. The
2 Alabama PSC believes that as a matter of equity
3 that, if the people of Nevada are being asked to
4 have nuclear waste shipments travel through their
5 communities, then the federal government should
6 show leadership by routing through the extensive
7 less-populated federal lands of Nevada. In short,
8 we believe the level of analysis of transportation
9 in the DEIS is appropriate for presenting the big
10 picture at this stage in the decision process,
11 provided the DOE follows through with its plan to
12 coordinate closely with state and local
13 governments at a later point, when implementation
14 planning is done.

15 1 In conclusion, the Alabama PSC believes that
16 the no-action alternatives in the DEIS are not
17 acceptable solutions, that the environmental
18 impact statement does not contain any potential
19 environmental impacts associated with the proposed
20 action that should be the basis for not proceeding
21 with the proposed action and that transportation
22 matters can best be dealt with in partnership with
23 the affected sites at a later date. Thank you for
24 the opportunity to provide the comments of the
25 Alabama PSC, and we will be filing written

1 comments at a later time.

2 MR. LAWSON: Thank you.

3 MS. SWEENEY: Thank you.

4 MR. LAWSON: Our next speaker is David Jones,
5 to be followed by Mr. or Mrs. Livingston and then
6 Jim Hardeman.